



**Environmental Utilities
Administration**
2005 Hilltop Circle
Roseville, California 95747

February 13, 2014

Ms. Gayleen Perreira
Senior Water Resources Control Engineer
Regional Water Quality Control Board, Central Valley Region
11020 Sun Center Drive #200
Rancho Cordova, CA 95670

Re: Comments on Tentative Waste Discharge Requirements for the City of Roseville
Pleasant Grove Wastewater Treatment Plant (NPDES No. CA0084573)

Dear Ms. Perreira:

On behalf of the City of Roseville (City), enclosed are comments on the Tentative Waste Discharge Requirements and NPDES permit (Tentative Permit) for the City of Roseville Pleasant Grove Wastewater Treatment Plant (PGWWTP). The City is particularly concerned about:

- Clear separation and understanding that this NPDES permit regulates the treatment plant and site proper and the wastewater collection system is regulated completely separately under the statewide WDRs
- The compliance determination for coliform
- Monthly reporting requirements for quarterly chronic toxicity testing

These concerns along with detailed comments are provided in Attachment A.

In the interim, please contact me at (916) 774-5754 or Art O'Brien at (916) 405-8944 if you have any questions regarding these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Ken Glotzbach".

Ken Glotzbach
Wastewater Utility Manager

Attachment A – Comments on PGWWTP Tentative Permit
Attachment - DMR letter from SWRCB to dischargers

cc: Art O'Brien, Robertson-Bryan, Inc.

ATTACHMENT A

CITY OF ROSEVILLE COMMENTS
ON
TENTATIVE
WASTE DISCHARGE REQUIREMENTS
FOR THE
CITY OF ROSEVILLE
PLEASANT GROVE WASTEWATER TREATMENT PLANT (CA 0084573)
PLACER COUNTY

Submitted February 13, 2014

Limitations and Discharge Requirements

p. 3, Monitoring and Reporting. The word “or” is missing from the following quote of the Water Code section 13267, subsection (b)(1):

“In conducting an investigation specified in subdivision (a), the regional board may require that any person who has discharged, discharges, or is suspected of having discharged or discharging, or who...”

p. 4, III.A. Discharge Prohibitions. The City remains concerned that the discharge prohibition, as written, is not clear enough to ensure that the prohibitions apply to the treatment plant only. The City requests the language to be changed as follows:

Discharge of wastewater from the Facility as specifically described in the Fact Sheet, p. F-4, Section II.B is prohibited except as described in this Order ~~at a location or in a manner different from that described in this Order~~ is prohibited.

p. 14, Footnote #1. The section reference in this footnote needs to be changed from VII.B.2.a to VI.B.2.a.

p. 15, Storage Basins Operating Requirements, item c.iii. An edit is needed in this section to reference “item ii above,” not iii, regarding discerning compliance with the objectionable odors specification.

p. 18, Facility Expansion, items VI.C.6.b.i, Facility Improvements; and item VI.C.6.b.ii, Request for Increase. An edit is needed in these sections to clarify that the 15 MGD is related to average dry weather flow:

The Discharger shall submit a request for an increase in the permitted flow rate to 15 MGD average dry weather flow.

p. 19, Total Coliform Organisms Effluent Limitations, item VII.D. The Tentative Order requires coliform testing 5/week. The 7-day median should be determined based on the last 7 tests, not

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the last 7 days. The requirement in the Tentative Order is inconsistent with the requirements in Title 22, which states:

60301.230. Disinfected tertiary recycled water

b) The median concentration of total coliform bacteria measured in the disinfected effluent does not exceed an MPN of 2.2 per 100 milliliters **utilizing the bacteriological results of the last seven days for which analyses have been completed** (emphasis added) and the number of total coliform bacteria does not exceed an MPN of 23 per 100 milliliters in more than one sample in any 30 day period. No sample shall exceed an MPN of 240 total coliform bacteria per 100 milliliters.

The language in the Tentative Order will require the City to test and report differently for the recycled water production report under the City's Master Reclamation Permit as opposed to reporting under the NPDES permit. This City sees no reason to have testing language different from Title 22, since it forms the basis for effluent limitation requirements.

The City, therefore requests the following changes to the Tentative Order:

For each day that an effluent sample is collected and analyzed for total coliform organisms, the 7-day median shall be determined by calculating the median concentration of total coliform bacteria in the effluent utilizing the bacteriological results of the last 7 days that a sample is collected. For example, if a sample is collected on a Wednesday, the result from that sampling event and all results from the previous 6 days where total coliform was sampled and tested (~~i.e.g., Tuesday, Monday, Sunday, Saturday, Friday, and Thursday, Wednesday, and Tuesday~~) are used to calculate the 7-day median. If the 7-day median of total coliform organisms exceeds a most probable number (MPN) of 2.2 per 100 milliliters, the Discharger will be considered out of compliance.

If the Central Valley Water Board chooses to not change the language, the City requests the following clarifying language to be added to this section. This clarifying language is consistent with p. 20 Section VII.F.3.b:

If the data set has an odd number of data points, then the median is the middle value. If the data set has an even number of data points, then the median is the average of the two values around the middle unless one or both of the points are <2, in which case the median value shall be the lower of the two data points.

Attachment E – Monitoring and Reporting Program (MRP)

p. E-5, Table E-3, Footnote 4. Footnote 4 describes sample collection, analytical method, and report level requirements for methyl mercury monitoring in the effluent. Methyl mercury monitoring is not specified in Table E-3. Further, the reporting level for methyl mercury specified in Footnote 4 of 0.05 ng/L conflicts with the reporting level specified in Table E-8, which requires a reporting level of 0.06 ng/L. Because methyl mercury monitoring is not specified in Table E-3, and because the footnote conflicts with Table E-8 specifications for

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methyl mercury, the City requests the following edit to Footnote 4 to remove references to methyl mercury:

- ⁴ ~~Unfiltered methyl mercury and Total mercury~~ samples shall be grab samples taken using clean hands/dirty hands procedures, as described in U.S. EPA method 1669: Sampling Ambient Water for Trace Metals at EPA Water Quality Criteria Levels, for collection of equipment blanks (section 9.4.4.2), and shall be analyzed by U.S. EPA method ~~1630/1631~~ (Revision E) with a reporting level of ~~0.05 ng/L for methyl mercury and 0.5 ng/L for total mercury~~.

p. E-6, 8. Test Failure, item b. The special provision cross-reference in this item should be to section IV.2.a.ii, not iii.

p. E-6-E-7, V.D.1, Chronic Test Reporting. The Tentative Order requires that regular chronic testing be done on a quarterly basis. This section requires that these results be reported within 30 days of completion of the test. The City requests that this 30 day reporting be deleted and that this test result be reported with the quarterly self monitoring reports described in Table E-9. The quarterly reporting sufficient because:

- The receipt of test results exceeding the monitoring trigger during regular monitoring requires notification to the Board within 24-hours after the receipt of test results. (p. E-6, Section V.C)
- Any exceedance of the trigger requires accelerated monitoring,
- Accelerated monitoring is initiated within 14-days of notification of laboratory of an exceedance of the monitoring trigger, and
- An exceedance during accelerated monitoring requires the preparation of a TRE action plan within thirty (30) days of notification by the laboratory of any test result exceeding the monitoring trigger during accelerated monitoring.

p. E-7, VI.A.1, Table E-5. Table E-5 requires monitoring of parameters when the emergency storage basins have held water for more than 7 days. The first four parameters are already included in the monitoring requirements listed on p.16, Section VI.C.4.c.ix which requires the City to keep a log of the storage basins that is submitted monthly with the eSMR. Because p. 16 of the permit contains the requirement to keep a log, inclusion of the first four parameters in Table E-5 is redundant. The City requests that those parameters be deleted from Table E-5, as shown below:

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Table E-5. Land Discharge Monitoring Requirements

Parameter	Units	Sample Type	Minimum Sampling Frequency	Required Analytical Test Method
Discharge Initiation	Date and time	--	1/Day	--
Discharge Completion	Date and time	--	1/Day	--
Basin Emptied	Date and time	--	1/Day	--
Discharge Type ¹	--	--	1/Day	--
Freeboard	Feet ^{2,3}	Measure	1/Day	--
pH	standard units	Grab	1/Week	4
Electrical Conductivity @ 25°C	µmhos/cm	Grab	1/Week	4
Odors	Observation	--	1/Week	--
Levee Condition	Observation	--	1/Week	--
Dissolved Oxygen	mg/L	Grab	1/Month	4

¹ For example, untreated due to plant upset, secondary treated.

² To be measured vertically to the lowest point of overflow.

³ Include estimation of volume of wastewater in each pond.

⁴ Pollutants shall be analyzed using the analytical methods described in 40 CFR Part 136 or by methods approved by the Central Valley Water Board or the State Water Board.

p. E-10, IX.C.1. This section requires the quarterly priority pollutant samples to be submitted with the monthly SMR's. Since this is a quarterly event, the City requests that the results of such quarterly monitoring be submitted with the quarterly reports to be consistent with the frequency of sampling. As such we request the following change:

Quarterly monitoring shall be conducted during the third year of the permit term (four consecutive samples, evenly distributed throughout the year) and the results of such monitoring be submitted to the Central Valley Water Board with the quarterly reports ~~monthly~~ SMR's.

p. E-18, X.C.2, DMR reporting. The City has received instructions from the SWRCB (See letter to Dischargers, attached) to: "...mail ONLY ONE copy of your DMRs (no need for duplicates)". The City requests the following change:

The Discharger shall submit the original DMR ~~and one copy of the DMR~~ to the address listed below:

Attachment F – Fact Sheet

p. F-4, I. Permit Information, item B. This section should be revised to clarify when the current NPDES permit for the Facility was adopted and subsequently amended, as follows:

The Facility discharges wastewater to Pleasant Grove Creek, a water of the United States, and a tributary to the Sacramento River via the Pleasant Grove Creek Canal and the Natomas Cross Canal, within the Lower Sacramento watershed. The Discharger was previously regulated by ~~Order R5-2008-0079-01~~ and National Pollutant Discharge Elimination System (NPDES) Permit No. CA0084573 adopted on 12 June 2008 (Order R5-2008-0077) and amended on 31 May 2013

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(Order R5-2008-0077-01), and expired on 1 June 2013. Attachment B provides a map of the area around the Facility. Attachment C provides a flow schematic of the Facility.

p. F-5, Table F-2, pH. The pH of 4.0 shown in this table is not consistent with the data presented in the Report of Waste Discharge (RWD). The RWD clarifies the reported minimum pH of 4.0 is not representative because it occurred during normal maintenance of the on-line pH probe. As such, the City requests that the 4.0 value be changed to 6.5 to be consistent with the RWD.

p. F-13, IV.A.1. To be consistent with the requested change on p. 4 of the Tentative Order, the City requests the following change to this section in Attachment F:

This prohibition is based on Water Code section 13260 that requires filing of a ROWD before discharges can occur. This prohibition applies specifically to discharges from the wastewater treatment facility and does not apply to the collection system. The collection system is governed State Water Board Order No. 2006-0003-DWQ and any future revisions thereto. The Discharger submitted a ROWD for the discharges described in this Order; therefore, discharges not described in this Order are prohibited.

p. F-33, Settleable Solids WQO. The word “of” needs to be changed to “or” in the following quote of the settleable material water quality objective.

“[w]ater shall not contain substances in concentrations that result in the deposition of material that causes nuisance or adversely affects beneficial uses.”

Dear Dischargers,

In order to ensure a more efficient processing of your DMRs, and to minimize issues and problems we have found in the past, and more importantly to prevent unnecessary **violations**, we are sending you an updated set of instructions that we need you to follow. If you need more assistance on any of these instructions please contact us by phone or email.

1. ALL DMRs need to be submitted by hard copy through the mail with the original wet signature to one of the below mailing addresses (we have added the NPDES Unit room # to ensure all DMRs come directly to us and are not redirected to another unit):

Standard Mail:

Division of Water Quality
NPDES Unit, 15-35A
Attn: DMR Processing Center
P.O. Box 100
Sacramento CA 95812-1000

FedEx/ UPS/ Other Private Carriers:

Division of Water Quality
NPDES Unit, 15-35A
Attn: DMR Processing Center
1001 I Street, 15th Floor
Sacramento, CA 95814

2. Mail ONLY ONE copy of your DMRs (no need for duplicates)
3. Self Monitoring Reports (SMRs), which are different from DMRs, **DO NOT** need to get mailed to the DMR Processing Center (State Water Board). These SMRs only need to be submitted to the corresponding Regional Boards as you normally do. At times, however, we get copies of the SMRs that get submitted to the Regional Board, but we do not need them at the State Water Board. Please update your procedures so that only DMRs are sent to the State Water Board and only SMRs are sent to the Regional Board.
4. When sending emails to DMR@waterboards.ca.gov please always write the permit number (CA#####) in the Subject line so we can quickly identify what facility it relates to.
5. If you generate your own forms, please make sure they match the original DMR forms **EXACTLY** (this includes having the monitoring dates in the correct format MM/DD/YYYY, using the same units indicated in the original DMR but if you

change your units i.e. mg/L to µg/L then add the corresponding unit code of 28 in the form itself in the blank field above the unit, and finally ensure parameter numbers are arranged numerically as in the original DMR form and are accurately copied)

6. Double check forms for correct monitoring dates, correct discharge number, quantity and concentration values, and that all required data fields have been filled with either a data value or an applicable NODI code. **Leaving any field empty will create a non-reporting violation.**
7. Make sure you include on your monthly submittal all the corresponding DMRs with the same monitoring period end date for that month (even if there was no discharge you still need to submit the form with the appropriate NODI code on the top right side of the first page).
8. Upon receiving updated DMRs due to a Permit renewal, please review the updated DMRs and let us know if you find any discrepancies between your permit requirements and what the DMRs require. In your submittal of discrepancies, please include the Permit number and Regional Board Order number.
9. **IT IS VERY IMPORTANT THAT** if contact information for your facility changes to please notify us IMMEDIATELY through email with the new contact name, phone # and appropriate email address. This way we can update our records and ensure future DMRs, notifications of missing DMRs, updated DMRs, etc, will be received.

Contact Information:

DMR Processing Center
Phone: 916-319-9152
Fax: 916-324-6684
dmr@waterboards.ca.gov